

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re FLINT WATER CASES

Civil Action No. 5:16-cv-10444-JEL-EAS
(consolidated)

Hon. Judith E. Levy
Mag. Elizabeth A. Stafford

**AGREED MOTION FOR FINAL ORDER AND JUDGMENT PURSUANT
TO FED. R. CIV. P. 54(b) AND 58(a)**

Individual Plaintiffs and Veolia North America, LLC, Veolia North America, Inc., Veolia Water North America Operating Services, LLC, and Veolia Environnement S.A. (collectively, “Veolia”), by and through the undersigned counsel, hereby move this Court to enter a Final Order and Judgment Pursuant to Fed. R. Civ. P. 54(b) and 58(a) as to all claims between Veolia and Individual Claimants (collectively, the “Parties”) pursuant to the Parties’ Individual Claimants Settlement Agreement.¹ In support thereof, Veolia states as follows:

1. Multiple lawsuits and claims, which were filed in, removed to, transferred to, or included as part of the claims process in the United States District

¹ Capitalized terms have the meanings provided in Article 1 – Definitions of the Settlement Agreement (Exhibit A to ECF No. 3205), unless otherwise stated.

Court for the Eastern District of Michigan, have become known as *In re Flint Water Cases*, Case No. 5:16-cv-10444 (E.D. Mich.). Lawsuits and claims have also been filed in state court and are currently pending in Genesee County, Michigan.

2. In light of the costs, risks, and burden of litigation, the Parties engaged in extensive arm's-length negotiations over many months in an effort to reach a resolution on Claimants' Flint Claims. Those negotiations were facilitated by a highly experienced mediator, Miles N. Ruthberg.

3. After extensive arm's-length negotiations before the Mediator, the Parties reached a Settlement and executed a Settlement Agreement reflecting the terms and benefits thereof.

4. Because the Claimants include Minors and LIIs, Veolia filed an agreed motion requesting that the Court approve the Settlement Agreement (the "Approval Motion"). *See* ECF No. 3205.

5. On April 3, 2025, this Court entered an order granting the Approval Motion and finding that the Settlement Agreement "is fair and serves the best interests of" the Minor and LII Claimants. *See* ECF No. 3217.

6. Pursuant to the Settlement Agreement, the Claimants agree to release Veolia from all claims and causes of action asserted by Claimants against Veolia in this litigation. *See* Exhibit A to ECF No. 3205, Art. 13.

7. Accordingly, Veolia moves this Court to enter a Final Order and Judgment that:

- a. Permanently bars, enjoins, enjoins, and restrains Claimants from commencing, filing, initiating, asserting, or maintaining any and all Released Claims; and
- b. Dismisses with prejudice any claims or lawsuits against Veolia filed by Claimants that are pending in this Federal Court without further costs, including claims for interest, penalties, cost, and attorneys fees.

8. A list of the claims and lawsuits against Veolia filed by Claimants that are pending in this Federal Court is attached hereto as Exhibit A.

9. Individual Plaintiffs' Counsel has no objections to and agrees with the relief requested by this Motion.

Wherefore, Veolia respectfully requests that this Court enter a Final Order and Judgment pursuant to the Parties' Settlement Agreement.

Dated: April 22, 2025

Respectfully submitted,

/s/ Michael A. Olsen

Michael A. Olsen

MAYER BROWN LLP

71 South Wacker Drive

Chicago, Illinois 60606

Telephone: (312) 782-0600

Email: molsen@mayerbrown.com

Counsel for the Veolia Defendants

Exhibit A

LIST OF FEDERAL COURT CASES

Case Name	Docket Number
Adams-Kiel, Lawanda, et al. v. Governor Richard D. Snyder, et al.	18-cv-11416-JEL-MKM
Alexander, Troy, et al. v. City of Flint, et al.	16-cv-13421-JEL-MKM
Alexander, Virgil, et al. v. Lockwood Andrews & Newnam, et al.	18-cv-10631-GCS-EAS
Anderson, Crystal., et al. v. Lockwood Andrews & Newnam, et al.	17-cv-13289-JEL-MKM
Anderson, Q., et al. v. City of Flint, et al.	20-cv-10171-JEL-MJH
Anderson, T., et al. v. City of Flint, et al.	17-cv-10746-JEL-RSW
Atou, et la. v. City of Flint, et al.	17-cv-10703-JEL-MKM
Barlow, et al. v. Governor Richard D. Snyder, et al.	18-cv-11281-JEL-MKM
Barnes, et al. v. City of Flint, et al.	17-cv-10689-JEL-MKM
Barton, et al. v. Lockwood Andrews & Newnam, et al.	18-cv-12007-JEL-MKM
Bellis McFadden, et al. v. Governor Richard D. Snyder, et al.	18-cv-11289-JEL-MKM
Berry, et al. v. City of Flint, et al.	17-cv-10717-JEL-MKM
Blevins, et al. v. City of Flint, et al.	20-cv-10172-JEL-APP
Boyd, et al. v. City of Flint, et al.	17-cv-10724-JEL-MKM
Brand, et al. v. City of Flint, et al.	17-cv-10713-JEL-MKM
Brown, et al. v. Governor Richard D. Snyder, et al.	18-cv-10726
Bryant v. Governor Richard D. Snyder, et al.	18-cv-11173-PDB-MKM
Carter, et al. v. City of Flint, et al.	20-cv-10370-SDD-EAS
Chandler, et al. v. Governor Richard D. Snyder, et al.	18-cv-11743-RHC-APP
Chapman, et al. v. Governor Richard D. Snyder, et al.	18-cv-10679-VAR-RSW
Cintron, et al. v. City of Flint, et al.	20-cv-10354-GAD-EAS
Cole, et al. v. City of Flint, et al.	19-cv-12709
Cooper, et al. v. Governor Richard D. Snyder, et al.	18-cv-10486-JEL-MKM
Corey, et al. v. Governor Richard D. Snyder, et al.	18-cv-11102-MAG-RSW
Coulter, et al. v. City of Flint	17-cv-10718-JEL-MKM
Coward, et al. v. Governor Richard D. Snyder, et al.	20-cv-10307-JEL-DRG
Cox, et al. v. Governor Richard D. Snyder, et al.	18-cv-11770-DPH-EAS
Cruz, et al. v. Lockwood Andrews & Newnam, P.C., et al.	17-cv-12116-JEL-MKM
Davidson, et al. v. City of Flint, et al.	19-cv-12675-MFL-MJH
Davis, et al. v. City of Flint, et al.	17-cv-10744-JEL-EAS
Douglas, et al. v. Governor Richard D. Snyder, et al.	18-cv-11287-NGE-EAS
Duhon, et al. v. Lockwood Andrews & Newnam, P.C., et al	21-cv-12854
Evans, et al. v. City of Flint, et al.	17-cv-10677-JEL-MKM
Franklin, et al. v. Governor Richard D. Snyder, et al.	18-cv-11967-BAF-SDD
Gaddy, et al. v. City of Flint, et al.	17-cv-11166-JEL-MKM

Gipson, Mildred, et al. v. Lockwood Andrews & Newnam, P.C., et al.	21-cv-12856
Guertin, et al. v. State of MI	16-cv-12412-JEL-MKM
Gulla, et al. v. Lockwood Andrews & Newnam, et al.	17-cv-10709-JEL-MKM
Hall, Tanesa, et al. v. Lockwood Andrews & Newnam, P.C., et al.	21-cv-12855
Harris, et al. v. Governor Richard D. Snyder, et al.	20-cv-10369-GCS-DRG
Huntley, et al. v. City of Flint, et al.	17-cv-10692-JEL-MKM
Jackson, et al. v. City of Flint, et al.	17-cv-10681-JEL-MKM
Jenkins, et al v. City of Flint, et al.	17-cv-10715-JEL-MKM
Keyes, et al. v. City of Flint, et al.	17-cv-10699-JEL-MKM
Langston Jr., et al. v. City of Flint, et al.	19-cv-12878-JEL-APP
Lee v. City of Flint, et al.	17-cv-11726-JEL-MKM
Lewis, Daniel, et al. v. Lockwood Andrews & Newnam, P.C., et al.	21-cv-12858
Long, Christina, et al. v. City of Flint, et al.	17-cv-12153
Lorick, et al. v. City of Flint, et al.	17-cv-10720-JEL-MKM
Lynn, et al. v. City of Flint, et al.	17-cv-10696-JEL-MKM
Mahan, et al. v. City of Flint, et al.	19-cv-12665-LVP-APP
Marble, et al v. Governor Richard D. Snyder, et al.	17-cv-12942-AJT-APP
Marchbanks, et al. v. City of Flint, et al.	20-cv-10322-JEL-MJH
Masters, et al. v. Lockwood Andrews & Newnam, et al.	17-cv-12289-JEL-MKM
McGrath, et al. v. City of Flint, et al.	17-cv-10725-JEL-MKM
Meeks, et al. v. City of Flint, et al.	17-cv-11165-JEL-MKM
Milhouse, et al. v. City of Flint, et al.	20-cv-10449-JEL-RSW
Mosley, et al. v. City of Flint, et al.	17-cv-10686-JEL-MKM
Nard, et al. v. City of Flint, et al.	20-cv-10356-MAG-APP
Parsons, et al. v. City of Flint, et al.	17-cv-10697-JEL-MKM
Patton, et al. v. City of Flint, et al.	17-cv-10721-JEL-DRG
Rainey, et al. v. City of Flint, et al.	17-cv-10682-JEL-MKM
Reid, et al. v. City of Flint, et al.	17-cv-10707-JEL-MKM
Robinson, et al. v. Lockwood Andrews & Newnam, et al.	18-cv-10633-JCO-SDD
Rogers v. Governor Richard D. Snyder, et al.	18-cv-10713-JEL-MKM
Scroggins, et al. v. City of Flint, et al.	17-cv-10710-JEL-MKM
Sears, et al. v. Governor Richard D. Snyder, et al.	18-cv-11298-RHC-EAS
Shields, et al. v. City of Flint, et al.	19-cv-12882-GAD-RSW
Sims, et al. v. Governor Richard D. Snyder, et al.	18-cv-12387-PDB-APP
Sirls, et al. v. State of MI, et al.	17-cv-10342-JEL-EAS
Stephens, Sharise, et al. v. Lockwood Andrews & Newnam, P.C., et al.	21-cv-12857
Summers, et al. v. City of Flint, et al.	17-cv-10745-JEL-MKM
Thomas, et al. v. City of Flint, et al.	17-cv-10688-JEL-MKM

Tyiska, et al. v. Governor Richard D. Snyder, et al.	18-cv-11841-DML-EAS
Upchurch, et al. v. Lockwood Andrews & Newnam, et al.	17-cv-10400-JEL-MKM
Waid, et al v. Governor Richard D. Snyder, et al. (class)	16-cv-10444-JEL-MKM
Walters, et al. v. City of Flint, et. al.	17-cv-10164-JEL-MKM
Warren, et al. v. City of Flint, et al.	17-cv-10679-JEL-MKM
Williams v. City of Flint, et al.	20-cv-10443-JEL-APP
Williamson, et al. v. City of Flint, et al.	20-cv-10330-SFC-RSW
Wilson, et al. v. City of Flint, et al.	17-cv-10743-JEL-APP
Wright, et al. v. City of Flint, et al.	20-cv-10453-JEL-MJH
Young, et al. v. City of Flint, et al.	17-cv-10687-JEL-MKM

*This list has been composed using the best information available and is subject to amendment if new or more accurate information becomes available.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re FLINT WATER CASES

Civil Action No. 5:16-cv-10444-JEL-EAS
(consolidated)

Hon. Judith E. Levy
Mag. Elizabeth A. Stafford

**FINAL JUDGMENT AND ORDER OF DISMISSAL WITH PREJUDICE
IMPLEMENTING INDIVIDUAL CLAIMANTS' SETTLEMENT
PURSUANT TO FED. R. CIV. P. 54(b) AND 58(a)**

On April 3, 2025, after hearing, this Court issued an opinion and order granting final approval of a settlement entered into by Individual Plaintiffs and Veolia North America, LLC, Veolia North America, Inc., Veolia Water North America Operating Services, LLC, and Veolia Environnement S.A. (collectively, “Veolia”) in the *In re* Flint Water Cases, Case No. 5:16-cv-10444. (ECF No. 3217) (the “Litigation”). For the reasons set forth on the record and in the opinion and order granting final approval, the Court hereby orders:

1. There is no just reason for delay in entering this Final Judgment for the Individual Claimants Settlement Agreement. The settlement should be implemented promptly. Accordingly, pursuant to Federal Rule of Civil Procedure 54(b), the Court

hereby enters this Final Judgment, and the Individual Claimants Settlement Agreement, including all Exhibits thereto, is hereby adopted and fully incorporated by reference into this Final Judgment.

2. This document constitutes a final judgment and separate document for purposes of Federal Rule of Civil Procedure 58(a).

3. For the reasons set forth on the record on March 27, 2025, and in ECF No. 3217, the Court has determined that the provisions of the Individual Claimants Settlement Agreement are fair, reasonable, and adequate, and that such processes and procedures are hereby confirmed, established and effective to implement the Individual Claimants Settlement Agreement.

4. The Court expressly incorporates and Orders that all other terms of the Individual Claimants Settlement Agreement apply.

5. As of the Effective Date, the cases identified in Exhibit A pending in Federal Court are dismissed with prejudice as to the Releasees without further costs, including claims for interest, penalties, cost, and attorney fees, except for the motions for an award of attorneys' fees and reasonable costs, which have been made and are to be determined by the Court. The lawsuits in Exhibit A are subject to this Judgment along with any other lawsuits that may later be identified. Pursuant to the Individual Claimants Settlement Agreement, Claimants in the lawsuits listed in

Exhibit A are barred, enjoined, and restrained from commencing, filing, initiating, asserting, or maintaining any and all Released Claims.

6. There were no opt outs to the Individual Claimants Settlement Agreement.

7. Without affecting the finality of this Judgment in any way, this Court retains continuing jurisdiction over: (a) the implementation of this settlement and any distribution to Individual Claimants pursuant to further orders of the Court; (b) disposition of the FWC Qualified Settlement Fund; (c) determining attorneys' fees, costs, expenses, and interest; (d) the action until the Final Judgment contemplated herein has become effective and each and every act agreed to be performed by the parties all have been performed pursuant to the Individual Claimants Settlement Agreement; (e) hearing and ruling on any matters relating to the distribution of the FWC Qualified Settlement Fund and Monetary Awards; and (f) all parties to the action and Releasors and Releasees, for the purpose of enforcing and administering the Individual Claimants Settlement Agreement and the mutual releases and other documents contemplated by, or executed in connection with the Individual Claimants Settlement Agreement.

IT IS SO ORDERED.

Date: April 28, 2025
Ann Arbor, Michigan

s/Judith E. Levy
JUDITH E. LEVY
United States District Judge

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Bellis McFadden, et al. v. Governor Richard D. Snyder, et al.	18-cv-11289-JEL-MKM
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Gaddy, et al. v. City of Flint, et al.	17-cv-11166-JEL-MKM

Gipson, Mildred, et al. v. Lockwood Andrews & Newnam, P.C., et al.	21-cv-12856
Guertin, et al. v. State of MI	16-cv-12412-JEL-MKM
Gulla, et al. v. Lockwood Andrews & Newnam, et al.	17-cv-10709-JEL-MKM
Hall, Tanesa, et al. v. Lockwood Andrews & Newnam, P.C., et al.	21-cv-12855
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Jenkins, et al v. City of Flint, et al.	17-cv-10715-JEL-MKM
Keyes, et al. v. City of Flint, et al.	17-cv-10699-JEL-MKM
Langston Jr., et al. v. City of Flint, et al.	19-cv-12878-JEL-APP
Lee v. City of Flint, et al.	17-cv-11726-JEL-MKM
Lewis, Daniel, et al. v. Lockwood Andrews & Newnam, P.C., et al.	21-cv-12858
Long, Christina, et al. v. City of Flint, et al.	17-cv-12153
Lorick, et al. v. City of Flint, et al.	17-cv-10720-JEL-MKM
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Meeks, et al. v. City of Flint, et al.	17-cv-11165-JEL-MKM
Milhouse, et al. v. City of Flint, et al.	20-cv-10449-JEL-RSW
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Robinson, et al. v. Lockwood Andrews & Newnam, et al.	18-cv-10633-JCO-SDD
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Warren, et al. v. City of Flint, et al.	17-cv-10679-JEL-MKM
Williams v. City of Flint, et al.	20-cv-10443-JEL-APP
Williamson, et al. v. City of Flint, et al.	20-cv-10330-SFC-RSW
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